



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

August 23, 2022

BY ECF

Honorable Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, NY 10007

Re: *ACLU v. FBI*, 21 Civ. 10719 (RA)

Dear Judge Abrams:

In accordance with the Court's April 25, 2022, Order, ECF No. 17, we write jointly on behalf of Defendant the Federal Bureau of Investigation ("FBI") and Plaintiff the American Civil Liberties Union ("ACLU") to update the Court on the status of the FBI's response to Plaintiff's Freedom of Information Act ("FOIA") request.

Since the parties' last status report, the FBI completed its production of documents in response to the FOIA request. The parties are now in the process of conferring regarding certain questions raised by ACLU regarding the FBI's response. The parties will continue to confer regarding these issues, and will advise the Court whether the matter can be dismissed or whether summary judgment briefing will be necessary.

The parties will provide a further status update to the Court within sixty days. Thank you for your attention to this matter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Dominika Tarczynska
DOMINIKA TARCZYNSKA
Assistant United States Attorney
Tel. (212) 637-2748
Fax (212) 637-2686
dominika.tarczynska@usdoj.gov
Attorney for Defendant

And

/s/ Laura Moraff

Laura Moraff

Nathan Freed Wessler

American Civil Liberties Union Foundation

125 Broad Street, 18th Floor

New York, NY 10004

(212) 549-2500

lmoraff@aclu.org

nwessler@aclu.org

Robert Hodgson

Daphna Spivack

New York Civil Liberties Union Foundation

125 Broad Street, 19th Floor

New York, NY 10004

(212) 607-3300

rhodgson@nyclu.org

Counsel for Plaintiff